

Marquis Aurbach Coffing
Tye S. Hanseen, Esq.
Nevada Bar No. 10365
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
thanseen@maclaw.com
Local counsel for Plaintiff

de Luca Levine
Benjamin D. Wharton, Esq.
Three Valley Square
Suite 220
Blue Bell, Pennsylvania 19422
Telephone: (215) 383-0081
Facsimile: (215) 383-0082
bwharton@delucalevine.com
Attorney for Plaintiff – pro hac pending

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

COUNTRY MUTUAL INSURANCE
COMPANY as successor to HOLYOKE
MUTUAL INSURANCE COMPANY a/s/o
LAKERIDGE VILLAS HOMEOWNERS
ASSOCIATION,

Plaintiff,

vs.

TYANNE ELLIS-GUN,

Defendant.

Case No.: 3:19-cv-00463-LRH-WGC

**VERIFIED PETITION FOR PERMISSION TO PRACTICE IN THIS CASE ONLY BY
ATTORNEY NOT ADMITTED TO THE BAR OF THIS COURT AND DESIGNATION
OF LOCAL COUNSEL**

Benjamin D. Wharton Esq., Petitioner, respectfully represents to the Court:

1. That Petitioner is an attorney at law and a member of the law firm of de Luca Levine, LLC with offices at Three Valley Square, Suite 220, Blue Bell, PA 19422. Telephone number: (215) 383-0081 and email address of bwharton@delucalevine.com.

2. That Petitioner has been retained personally or as a member of the law firm of de Luca Levine, LLC to provide legal representation in connection with Country Mutual Insurance Company in the above-entitled case now pending before this Court.

3. That since 2011, Petitioner has been and presently is a member in good standing of the bar of the highest Court of the State of Pennsylvania where Petitioner regularly practices law. Petitioner shall attach a certificate from the state bar or from the clerk of the Supreme Court or highest admitting court of each state, territory, or insular possession of the United States in which the applicant has been admitted to practice law certifying the applicant's membership therein is in good standing.

4. That Petitioner was admitted to practice before the following United States District Courts, United States Circuit Courts of Appeal, the Supreme Court of the United States and Courts of other States on the dates indicated for each, and that Petitioner is presently a member in good standing of the bars of said Court:

<i>Court</i>	<i>Date Admitted</i>	<i>Bar Number</i>
<u>Pennsylvania</u>	<u>2011</u>	<u>312394</u>
<u>New Jersey</u>	<u>2012</u>	<u>033742011</u>
<u>U.S. District Court of NJ</u>	<u>8/26/2019</u>	<u></u>
<u>U.S. District Court- ED PA</u>	<u>2011</u>	<u></u>

5. That there are or have been no disciplinary proceedings instituted against Petitioner, nor any suspension of any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings, except as described in detail below:

6. That Petitioner has never been denied admission to the State Bar of Nevada.
(Give particulars if ever denied admission):

1 7. That Petitioner is a member of good standing in the following Bar Associations:

2 (State "none" if Petitioner is not a member of other Bar Associations.) *none*

3
4
5 8. Petitioner has filed application(s) to appear as counsel under Local Rule IA 10-2
6 during the past three (3) years in the following matters:

7 Date of Application	8 Cause	9 Title of Court Administrative Body or Arbitrator	10 Was Application Granted or Denied
11	12	13	14
15	16	17	18
19	20	21	22
23	24	25	26
27	28		

(If necessary, please attach a statement of additional applications)

9. Petitioner consents to the jurisdiction of the courts and disciplinary boards of the State of Nevada with respect to the law of this state governing the conduct of attorneys to the same extent as a member of the State Bar of Nevada.

10. Petitioner agrees to comply with the standards of professional conduct required of the members of the bar of this court.

11. Petitioner has disclosed in writing to the client that the applicant is not admitted to practice in this jurisdiction and that the client has consented to such representation.

///

///

///


///

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

That Petitioner respectfully prays that Petitioner be admitted to practice before this Court
FOR THE PURPOSES OF THIS CASE ONLY.


Petitioner's Signature

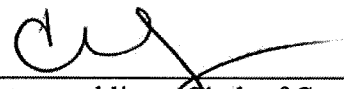
STATE OF PENNSYLVANIA)
COUNTY OF _MONTGOMERY)

Benjamin D. Wharton, Esq., Petitioner, being first duly sworn, deposes and says: That
the foregoing statements are true.


Petitioner's Signature

Subscribed and sworn to before me this

10 day of OCTOBER, 2019.


Notary public or Clerk of Court

Commonwealth of Pennsylvania - Notary Seal
Courtney Scrivner, Notary Public
Montgomery County
My commission expires August 30, 2023
Commission number 1288191

1 **DESIGNATION OF RESIDENT ATTORNEY ADMITTED TO THE BAR OF THIS**
2 **COURT AND CONSENT THERETO.**


3 Pursuant to the requirements of the Local Rules of Practice for this Court, the Petitioner
4 believes it to be in the best interests of the client(s) to designate Tye S. Hanseen, Esq., Attorney
5 at Law, member of the State of Nevada and previously admitted to practice before the above-
6 entitled Court as associate residence counsel in this action. The address of said designated
7 Nevada counsel is:

8
9 10001 Park Run Drive
10 Las Vegas, Nevada 89145
11 (702) 382-0711
12

13 By this designation the Petitioner and undersigned party(ies) agree that this designation
14 constitutes agreement and authorization for the designated resident admitted counsel to sign
15 stipulations binding on all of us.

16 **APPOINTMENT OF DESIGNATED RESIDENT NEVADA COUNSEL**

17 The undersigned party(ies) appoints Tye S. Hanseen, Esq. as their Designated Resident
18 Nevada Counsel in this case.

19
20 
21 _____
22 (Party signature)

23 _____
24 (Party signature)

25 _____
26 (Party signature)

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

CONSENT OF DESIGNEE

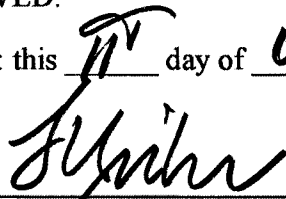
The undersigned hereby consents to serve as associate resident Nevada counsel in this case.

/s/ Tye S. Hanseen , NV Bar No. 10365

Designated Resident Nevada Counsel's Signature Bar number

APPROVED:

DATED: this 11th day of Oct., 2019.



UNITED STATES DISTRICT JUDGE



Supreme Court of Pennsylvania

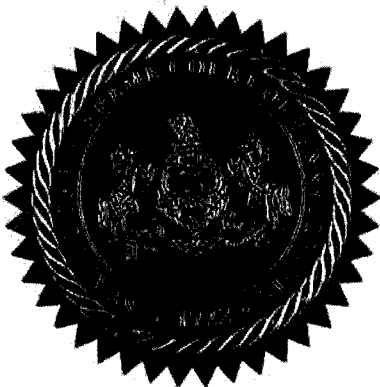
CERTIFICATE OF GOOD STANDING

Benjamin David Wharton, Esq.

DATE OF ADMISSION

November 21, 2011

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: September 17, 2019

Patricia A. Johnson

**Patricia A. Johnson
Chief Clerk**

Supreme Court of New Jersey



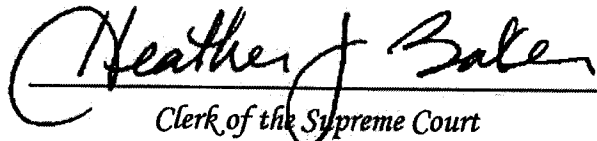
Certificate of Good Standing

This is to certify that **BENJAMIN D WHARTON**
(No. **033742011**) was constituted and appointed an Attorney at Law of New
Jersey on **April 27, 2012** and, as such,
has been admitted to practice before the Supreme Court and all other courts of this State
as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in
Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if
the Court's records reflect that the attorney: 1) is current with all assessments imposed as a
part of the filing of the annual Attorney Registration Statement, including, but not
limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not
suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this
State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-
12.

Please note that this Certificate does not constitute confirmation of an attorney's
satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice
law in this State.

In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
13TH day of September, 20 19 .


Clerk of the Supreme Court